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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Bankruptcy Case No. 19-30088 (DM)

In re:

Chapter 11

PG&E CORPORATION,

(Lead Case) (Jointly Administered)

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**DECLARATION OF A. ANNA CAPELLE IN
SUPPORT OF MOTION TO REDACT
DOCUMENTS FILED IN SUPPORT OF
REORGANIZED DEBTORS' OMNIBUS
OBJECTION TO CLAIMS**

Debtors.

[No Hearing Requested]

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

1 I, A. Anna Capelle, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as a Managing Counsel, Litigation and Commercial Contracts, in the Law
5 Department of Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E
6 Corporation (“**PG&E Corp.**”) and together with Utility, the “**Reorganized Debtors**” in the above-
7 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I have been employed in this role since May 1,
8 2020, and prior to such date I was employed as Interim Managing Counsel, Strategy and Policy. I have
9 been employed as an attorney for PG&E since October 2006. In my current role, I am responsible for
10 supervising seven litigation attorneys, and advising leaders on litigation and general dispute issues. I
11 also regularly consult with my colleagues elsewhere in the Utility’s Law Department on legal issues that
12 cover a variety of other subject matter. I submit this Declaration in support of the *Motion to Redact*
13 *Documents Filed in Support of Reorganized Debtors’ Omnibus Objection to Claims* (the “**Motion**”),¹
14 filed contemporaneously herewith.

15 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
16 my personal knowledge, the knowledge of other Utility personnel working under and alongside me on
17 this matter, my discussions with PG&E’s professionals and various other advisors and counsel, and my
18 review of relevant documents and information. If called upon to testify, I would testify competently to
19 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the
20 Reorganized Debtors.

21 3. **Exhibit 1** to the Omnibus Objection (the “**Redacted Exhibit**”) contains the names,
22 contact information, and Claim numbers (collectively, the “**Personal Information**”) for a number of
23 current and former employees of the Reorganized Debtors (the “**Redacted Claimants**”) who have
24 pending Claims, many of which are directly connected with their prior or current employment with the
25 Reorganized Debtors.

26 4. The Reorganized Debtors have made a commitment to their employees to keep their
27

28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

1 information confidential. The Reorganized Debtors want to avoid providing contact information for
2 their employees lest that information be used by members of the public to initiate unwanted contact.
3 Furthermore, such information could be used, among other things, to perpetrate identity theft or to locate
4 survivors of domestic violence, harassment, or stalking.

5 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
6 correct to the best of my knowledge, information, and belief. Executed this nineteenth day of August,
7 2021.

8
9 /s/ A. Anna Capelle
A. Anna Capelle